

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CITY OF LIVONIA EMPLOYEES'  
RETIREMENT SYSTEM, On Behalf of Itself  
and All Others Similarly Situated,

Plaintiff,

vs.

WYETH, et al.,

Defendants.

Civil Action No. 1:07-cv-10329-RJS

CLASS ACTION

**ECF CASE**

MOTION TO ADMIT COUNSEL *PRO HAC*  
*VICE*

NOV 30 2010

5856063-87476

2010 NOV 30 11:30 AM  
CLERK OF COURT  
U.S. DISTRICT COURT  
S.D.N.Y.


PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Samuel H. Rudman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission, *pro hac vice*, of:

Christopher D. Stewart  
Robbins Geller Rudman & Dowd LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
Fax: 619/231-7423  
Email: [cstewart@rgrdlaw.com](mailto:cstewart@rgrdlaw.com)

Christopher D. Stewart is a member in good standing of the Bar of the State of California (Certificate of Good Standing attached hereto as Exhibit A), as well as the United States District Court for the Central District of California. There are no pending disciplinary proceedings against Christopher D. Stewart in any state or federal court.

DATED: November \_\_, 2010

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD

  
\_\_\_\_\_  
SAMUEL H. RUDMAN

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[llargent@rgrdlaw.com](mailto:llargent@rgrdlaw.com)

Lead Counsel for Plaintiff

# EXHIBIT A



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

November 17, 2010

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, CHRISTOPHER DENNIS STEWART, #270448 was admitted to the practice of law in this state by the Supreme Court of California on June 4, 2010; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

_____	X	
CITY OF LIVONIA EMPLOYEES'	:	Civil Action No. 1:07-cv-10329-RJS
RETIREMENT SYSTEM, On Behalf of Itself	:	
and All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	<b>ECF CASE</b>
	:	
vs.	:	AFFIDAVIT OF SAMUEL H. RUDMAN IN
	:	SUPPORT OF MOTION TO ADMIT
WYETH, et al.,	:	COUNSEL <i>PRO HAC VICE</i>
	:	
Defendants.	:	
_____	X	

SAMUEL H. RUDMAN, being duly sworn, deposes and says as follows:

1. I am a member of Robbins Geller Rudman & Dowd LLP, Lead Counsel for plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Christopher D. Stewart as counsel, *pro hac vice*, to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in May 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Stewart is an associate with Robbins Geller Rudman & Dowd LLP, in San Diego, California.

4. I have found Mr. Stewart to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move for the admission of Christopher D. Stewart, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Christopher D. Stewart *pro hac vice*, which is attached hereto as Exhibit A.


WHEREFORE it is respectfully requested that the motion to admit Christopher D. Stewart, *pro hac vice*, to represent plaintiff in the above-captioned matter, be granted.

DATED: November 29, 2010

State of New York  
County of Suffolk

  
SAMUEL H. RUDMAN (SR-7957)

Subscribed and sworn to before me on this 29 day of November, 2010, by Samuel H. Rudman, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me.

 (signature of Notary) (seal of Notary)

- 1 -

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**KELLY A. STADELMANN**  
Notary Public, State Of New York  
No. 01ST6047260  
Qualified in Nassau County  
Commission Expires August 28, 2014

# EXHIBIT A



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

	X	
CITY OF LIVONIA EMPLOYEES'	:	Civil Action No. 1:07-cv-10329-RJS
RETIREMENT SYSTEM, On Behalf of Itself	:	
and All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	<b>ECF CASE</b>
	:	
vs.	:	[PROPOSED] ORDER FOR ADMISSION
	:	<i>PRO HAC VICE</i> ON WRITTEN NOTICE
WYETH, et al.,	:	
	:	
Defendants.	:	
	:	
	X	

Upon the motion of Samuel H. Rudman, attorney for plaintiff and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Christopher D. Stewart  
ROBBINS GELLER RUDMAN & DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
Fax: 619/231-7423  
Email: [cstewart@rgrdlaw.com](mailto:cstewart@rgrdlaw.com)

is admitted to practice, *pro hac vice*, as counsel for plaintiff in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE RICHARD J. SULLIVAN  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I, Kelly Stadelmann, hereby certify that on November 29, 2010, I caused a true and correct copy of the annexed documents to be served by U.S. mail to all counsel listed on the attached service list.

  
Kelly Stadelmann

**WYETH**

**Service List - 10/22/2010 (07-0254)**

**Page 1 of 1**

**Counsel For Defendant(s)**

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Lynn K. Neuner  
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425 Lexington Avenue  
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212/455-2502(Fax)**

**Counsel For Plaintiff(s)**

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